

## THE CITY OF NEW YORK LAW DEPARTMENT

100 CHURCH STREET NEW YORK, NY 10007 Andrea O'Connor Labor & Employment Law Division Phone: 212-356-4015 Fax: 212-356-1148

aoconnor@law.nyc.gov

May 24, 2022

## **VIA ECF and Hand Delivery**

HON. SYLVIA O. HINDS-RADIX

Corporation Counsel

Honorable Kiyo A. Matsumoto United States District Judge Eastern District of New York 225 Cadman Plaza East, Room S905 Brooklyn, New York 11201

Re: <u>Broecker</u>, et al. v. NYC Department of Education, et al.

Docket No. 21 CV 6387 (KAM)(LB)

Dear Judge Matsumoto:

I am an Assistant Corporation Counsel in the office of Georgia M. Pestana, Corporation Counsel of the City of New York, attorney for defendants New York City Department of Education and Meisha Porter (collectively, "DOE Defendants") in the above-captioned matter. I write today pursuant to the Court's March 7, 2022 Order to provide the Court with two courtesy copies of the DOE Defendants motion papers in connection with their motion to dismiss the Amended Complaint. Specifically, enclosed please find DOE Defendants' Notice of Motion, dated April 4, 2022 (Dkt. No. 114), Declaration of Andrea O'Connor, with exhibit, dated April 4, 2022 (Dkt. No. 115), Memorandum in Support, dated April 4, 2022 (Dkt. No. 116) and Reply Memorandum in Support, dated May 24, 2022 (Dkt. No. 127).

Respectfully submitted,

Andrea O'Connor Assistant Corporation Counsel

**Enclosures** 

cc: All Counsel, By ECF (without enclosures)